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Subject: Comments on Preliminary Draft CEQA Guideline Amendments for GHG

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(a) A lead agency should consider the following, where applicable, in assessing the significance of impacts from greenhouse gas emissions, if any, on the environment:

1. The extent to which the project could help or hinder attainment of the state's goals of reducing greenhouse gas emissions to 1990 levels by the year 2020 as stated in the Global Warming Solutions Act of 2006. A project may be considered to help attainment of the state's goals by being consistent with an adopted statewide 2020 greenhouse gas emissions limit or the plans, programs, and regulations adopted to implement the Global Warming Solutions Act of 2006;
- [Comment:](#) Should assessment also consider the potential for the project to have long term impacts beyond 2020, even if its own GHG impacts are not significant in 2020, but a) where it pre-empts the development of higher density, more transit-oriented uses on the same site beyond 2020, or b) where it provides less than the density contained in the General Plan and SCS, forcing the development not accommodated on the site to higher impact locations at the region's edges?

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(2) Rely on qualitative or other performance based standards for estimating the significance of greenhouse gas emissions.

- [Comment:](#) What is an example of a qualitative standard?

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(5) Where mitigation measures are proposed for reduction of greenhouse gas emissions through off-site measures or purchase of carbon offsets, these mitigation measures must be part of a reasonable plan of mitigation that the relevant agency commits itself to implementing.

- [Comment:](#) In addition to carbon offsets, suggest mentioning "payment of carbon impact fees"

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(i) Project level CEQA documents need not provide additional project-level greenhouse gas emissions analysis or mitigation measures, if the proposed project is consistent with an applicable regional or local plan that adequately addresses greenhouse gas emissions, and the plan is one for which an EIR has previously been certified.

- [Comment:](#) Suggest specifying the criteria for assessing consistency, i.e. in terms of policies, land use amounts, project-generated greenhouse gas emissions and mitigation measures.

Appendix G – Part XVI Transportation

~~a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on the roads, or congestion at intersections), roadway vehicle volume or vehicle miles traveled?~~

~~b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?~~

~~f) Result in inadequate parking capacity?~~

- [Comments](#)
 - Suggest adding a criterion: “Contribute to a cumulative increase VMT and/or increase in emissions per VMT for the community or region above 1990 per capita levels, or contribute to a redistribution of projected regional growth in a manner that indirectly results in higher regional VMT per capita than in the no-project case”.
 - Suggest adding a criterion: “Disrupt existing, or interfere with planned, roadway, aviation, goods movement, public transit, bicycle, or pedestrian facilities or services”
 - Suggest adding a criterion: “Substantially increase traffic on a roadway that does not meet current design standards”.
 - Suggest adding a criterion: “Increase traffic on a roadway that does not have full funding identified for its cumulative year sufficient to provide the designated functional classification and number of lanes identified in the governing General Plan or Regional Transportation Plan.
 - Suggest adding a criterion: “Increase demand for public transit service to beyond the demand identified and funded in the governing General Plan or Regional Transportation Plan.”

- Suggest adding a criterion: “Increase emergency response times falling outside the emergency service providers’ maximum standard.”
- Suggest adding a criterion: “Substantially reduce parking supply without complementary measures to reduce parking demand or insure that alternate travel mode options are available”.

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